

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF OKLAHOMA**

1. LADONNA PARIS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 22-CV-235-TCK-JFJ
)	
1. RONNI CARROCIA,)	
2. DAYLAN ROOT,)	
3. TY BURNS,)	
4. CITY OF TULSA,)	
5. G.T. BYNUM, IV,)	
)	
Defendants.)	

**DEFENDANT CITY OF TULSA’S UNOPPOSED MOTION
FOR DISCOVERY PROTECTIVE ORDER**

Defendant City of Tulsa respectfully requests the Court enter a Stipulated Discovery Protective Order for this case. No party objects to this motion.

1. The Plaintiff is seeking confidential personnel records and proprietary information related to law enforcement. In order to protect Defendant’s asserted interests and to facilitate the flow of discovery, the parties agree that a Discovery Protective Order should be entered in this case.
2. The parties have agreed to this motion and to a proposed Stipulated Protective Order, which is attached as Exhibit 1 and is also being submitted separately.
3. The agreed proposed substantive changes from the Court’s Protective Order Template are redlined in the draft. The reasons for the requested changes are as follows:

- a. Paragraph 1(f). The parties request to omit paragraph “1(f)” from the Court’s template to remove confusion as to what documents or materials are protected.
 - b. Paragraph 2(a). The parties request to omit “if appropriate” to remove any confusion around whether a document or material falls under Rule 26 and have agreed it should be designated if it falls under Rule 26.
 - c. Paragraph 2(b). Likewise, the parties request to omit “if appropriate” to remove any confusion regarding whether the subject document or material falls under Rule 26.
 - d. Paragraph 2(d). Here, the parties are addressing labeling and request that any media have file names that include the confidential designation to avoid any potential issues caused by the cover letter and the media becoming separated.
4. This motion is compliance with the Court’s Protective Order instructions.

Respectfully Submitted,

CITY OF TULSA,
a municipal corporation

JACK C. BLAIR,
City Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of November 2022, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

s/R. Lawson Vaughn

R. Lawson Vaughn